



December 7, 2016

Louisiana Coastal Protection and Restoration Authority
P.O. Box 44027
Baton Rouge, Louisiana 70804

U.S. Fish and Wildlife Service
P.O. Box 49567
Atlanta, Georgia 30345

RE: Comments on NRDA Louisiana Trustee Implementation Group Draft Restoration Plan #1

Dear Members of the NRDA Louisiana Trustee Implementation Group (TIG),

Thank you for providing this comment opportunity on the Louisiana TIG's first draft restoration plan to address injury from the 2010 *Deepwater Horizon* oil spill. At Audubon Louisiana, the state office of the National Audubon Society, we are particularly encouraged by the restoration of two important bird nesting islands, Queen Bess Island and Rabbit Island.

Queen Bess Island supported about 16% of the state's population of brown pelicans between 2010 and 2013, yet only a small proportion of the island is currently suitable habitat. Restoration of this island has great potential to boost populations of not only brown pelicans, but also several species of colonial wading birds, terns, and skimmers. Similarly, Rabbit Island is currently Louisiana's largest nesting rookery for the rare reddish egret and serves as an important waterbird and seabird nesting colony in a region otherwise mostly devoid of available nesting sites for these species. It also likely connects (genetically and demographically) nationally important waterbird populations between the Texas coast and southeastern Louisiana, and thus is important for stabilizing bird population in the broader region. These islands historically and currently support significant populations of several species that experienced injury during the spill, including multiple species of state and national conservation concern.

On both islands, we would encourage ensuring a variety of microhabitats are explicitly designed, particularly to benefit ground-nesting seabirds whose regional populations are under greater pressure than that of brown pelicans. To ensure the maximum value of these islands as these projects moves toward construction, we would encourage funding be budgeted to periodically control and manage non-native nest predators when necessary.

Additionally, we support the three projects offered to benefit wetlands, coastal and nearshore habitats in Barataria, Terrebonne, and Pontchartrain basins (Terrebonne Basin Ridge and Marsh Creation, Barataria Basin Ridge and Marsh Creation, and Lake Borgne Ridge and Marsh Creation increments) because we understand the need for restoration to be conducted in these areas. We believe that the plan would benefit from some additional information on these projects to provide a clearer understanding of how these project increments will ultimately be evaluated to meet the slated criteria for the Wetlands, Coastal, and Nearshore Habitats Restoration Type.

And though we are generally supportive of the proposed shoreline protection project in Jean Lafitte National Historical Park and Preserve, again we believe the plan would be stronger with the addition of more project information. To that end, we suggest some clarification regarding how the project addresses the goals of Habitat Projects on Federally Managed Lands.

While we appreciate that the Louisiana TIG prioritized these particular projects to move forward now from the many available projects identified in the Coastal Master Plan, the explanation of *how* these six projects meet the Restoration Goals identified in the PDARP/PEIS and *why* they provide the most immediate benefits to the basins and resources greatest affected by the spill will be useful in the public's understanding of the rigor undertaken in the evaluation conducted.

Finally, the discussion in the report of the benefits of sediment diversions, and the TIG evaluation of diversions to incorporate into future NRDA rounds, is promising. We hope that the diversion projects contemplated for funding through NRDA are included as soon as possible.

We appreciate the work that has gone into the development of this first draft restoration plan and look forward engaging with the Louisiana TIG as the NRDA process continues into the coming years. We offer these comments in an effort to complement the work conducted.

Thanks again for the opportunity to comment.

Sincerely,

Cynthia Duet
Deputy Director
Audubon Louisiana